

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: : CHAPTER 7
Garnet Stacey Pinnock, :
:
Debtor. : CASE NO: 18-71216-SMS

NOTICE OF HEARING

PLEASE TAKE NOTICE that Garnet Stacey Pinnock, Debtor, has filed a **Motion to Reopen** and related papers seeking an order reopening the Chapter 7 case.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the **Motion to Reopen** in Courtroom 1201, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia, 30303, at 10:30 A. M. on Wednesday, January 13, 2021.

**Given the current public health crisis, hearing may be telephonic only. Please check the "[Important Information Regarding Court Operations During COVID-19 Outbreak](#)" tab at the top of the GANB Website prior to the hearing for instructions on whether to appear in person or by phone.

Your rights may be affected by the court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the court to grant the relief sought in these pleadings or if you want the court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk at least two business days before the hearing. The address of the Clerk's Office is: Clerk, U. S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, S.W., Atlanta Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

DATED: December 30, 2020.

THE CARSON FIRM, LLC

/s/ Nicole Carson

Nicole Carson

Attorney for Debtor

Georgia Bar No. 722305

The Carson Firm, LLC

400 Galleria Pkwy, #1500

Atlanta, Georgia 30339

Phone: (404) 782-2347

Fax: (678) 288-7866

Email: nicole@bk-attorneys.com

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MOTION TO REOPEN

COMES NOW, Garnet Stacey Pinnock, Debtor, by and through Debtor's attorney, Nicole Carson and moves this Honorable Court to reopen the bankruptcy case, and in support thereof states as follows:

1.

Debtors filed a petition for relief pursuant to Chapter 7 Title 11 U.S.C on December 19, 2018.

2.

A meeting of creditors pursuant to Section 341 was held and concluded on February 19, 2019.

3.

Neither the Trustee nor any creditors filed any complaints to discharge, or to determine dischargeability of certain debts on or before the respective deadlines to file the same.

4.

The Debtor received a standard discharge on April 1, 2019.

5.

Debtor has discovered the existence of one or more judicial lien(s) filed in Dekalb County Magistrate Court which impair certain exemptions claimed in the bankruptcy petition. The judicial lien(s) need to be avoided or declared void to protect Debtor's interests in real property and to allow her to sell, modify, or refinance her residence.

WHEREFORE, Garnet Stacey Pinnock, the Debtor, prays this Honorable Court for the following relief:

- A. that this Motion to Reopen be granted;
- B. for such other and further relief this court deems just and proper.

DATED: December 30, 2020

Respectfully submitted,
THE CARSON FIRM, LLC

/s/ Nicole Carson
Nicole Carson
Attorney for Debtor
Georgia Bar No. 722305
The Carson Firm, LLC
400 Galleria Pkwy, #1500
Atlanta, Georgia 30339
Phone: (404) 782-2347
Fax: (678) 288-7866
Email: nicole@bk-attorneys.com

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CERTIFICATE OF SERVICE

I, Nicole Carson, hereby certify, under penalty of perjury, that I am more than eighteen (18) years of age, and that on this day I served a copy of the within ***Notice of Hearing and Motion to Reopen*** upon the following parties listed below, and to all those parties listed on the attached matrix, by depositing a copy of same in the United States Mail with sufficient postage thereon to ensure delivery to:

Garnet Stacey Pinnock
PO Box 361735
Decatur, GA 30036

S. Gregory Hays
Hays Financial Consulting, LLC
Suite 555
2964 Peachtree Road
Atlanta, GA 30305

Office of the United States Trustee
362 Richard Russell Building
75 Ted Turner Drive, SW
Atlanta, GA 30303

This 30th day of December, 2020.

/s/ Nicole Carson
Nicole Carson GABN 722305
Attorney for Debtor
The Carson Firm, LLC
400 Galleria Pkwy, #1500
Atlanta, Georgia 30339
Phone: (404) 782-2347
Fax: (678) 288-7866
Email: nicole@bk-attorneys.com

Label Matrix for local noticing

113E-1

Case 18-71216-sms

Northern District of Georgia

Atlanta

Wed Dec 30 22:52:56 EST 2020

(p) BMW FINANCIAL SERVICES

CUSTOMER SERVICE CENTER

PO BOX 3608

DUBLIN OH 43016-0306

Amex

Correspondence/Bankruptcy

PO Box 981540

El Paso, TX 79998-1540

BMW Bank of North America

4515 N Santa Fe Ave. Dept. APS

Oklahoma City, OK 73118-7901

Capital One

Attn: Bankruptcy

PO Box 30285

Salt Lake City, UT 84130-0285

Nicole Carson

The Carson Firm

#1500

400 Galleria Parkway

Atlanta, GA 30339-5953

(p) JPMORGAN CHASE BANK N A

BANKRUPTCY MAIL INTAKE TEAM

700 KANSAS LANE FLOOR 01

MONROE LA 71203-4774

Elizabeth Childers

Shapiro, Pendegast and Hasty

Suite 300

211 Perimeter Center Parkway, NE

Atlanta, GA 30346-1305

Citicard

General Correspondence

PO Box 6500

Sioux Falls, SD 57117-6500

Collectron Of Atlanta

Carter-Young

Attn: Bankruptcy

PO Box 92269

Atlanta, GA 30314-0269

Comenitybank/New York

Attn: Bankruptcy Dept

PO Box 182125

Columbus, OH 43218-2125

Comenitybank/jared

PO Box 182789

Columbus, OH 43218-2789

Credit First National Assoc

Attn: Bankruptcy

PO Box 81315

Cleveland, OH 44181-0315

Credit One Bank

Attn: Bankruptcy

PO Box 98873

Las Vegas, NV 89193-8873

(p) THE CREDIT UNION LOAN SOURCE LLC

10800 ALPHARETTA HWY STE 208 759

ROSWELL GA 30076-1490

DHI Mortgage Company

Attn: Bankruptcy

10700 Pecan Park Blvd

Ste 450

Austin, TX 78750-1481

Everhome Mortgage Co

Ever Bank

Attn: Bankruptcy Dept

301 West Bay Street

Jacksonville, FL 32202-5180

First Fin Investment Fund V

Dekalb Medical Center

3100 Breckinridge Blvd #722

Duluth, GA 30096-4985

S. Gregory Hays

Hays Financial Consulting, LLC

Suite 555

2964 Peachtree Road

Atlanta, GA 30305-4909

Germani Gabrielle Hunt

Sissac Legal Group P.C.

6595 Roswell Rd., Ste. G

PMB 90656

Atlanta, GA 30328-3152

(p) INTERNAL REVENUE SERVICE

CENTRALIZED INSOLVENCY OPERATIONS

PO BOX 7346

PHILADELPHIA PA 19101-7346

Jared/Sterling Jewelers

375 Ghent Rd

Fairlawn, OH 44333-4601

Jared/Sterling Jewelers

Attn: Bankruptcy

PO Box 3680

Akron, OH 44309-3680

LendingClub

Attn: Bankruptcy

71 Stevenson St

Suite 1000

San Francisco, CA 94105-2967

MOHELA/Debt of Ed

Attn: Bankruptcy

633 Spirit Dr

Chesterfield, MO 63005-1243

Richard B. Maner

Richard B. Maner, P.C.

Suite 200

180 Interstate N Parkway

Atlanta, GA 30339-2106

Navient

Attn: Bankruptcy

PO Box 9000

Wiles-Barr, PA 18773-9000

Office of the United States Trustee

362 Richard Russell Building

75 Ted Turner Drive, SW

Atlanta, GA 30303-3315

PRA Receivables Mgmt

PO Box 41021

Norfolk, VA 23541-1021

Garnet Stacey Pinnock

PO Box 361735

Decatur, GA 30036-1735

Prosper Funding
221 Main Street
Suite 300
San Francisco, CA 94105-1909

Roy D. Reagin Jr.
3100 Breckinridge Bl #722
Duluth, GA 30096-4985

Select Portfolio Servicing
Attn: Bankruptcy
PO Box 65250
Salt Lake City, UT 84165-0250

Sterling Jewelers
Attn: Bankruptcy
PO Box 1799
Akron, OH 44309-1799

Synchb/ccsycc
Attn: Bankruptcy
PO Box 965060
Orlando, FL 32896-5060

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Synchrony Bank/Care Credit
Attn: Bankruptcy Dept
PO Box 965061
Orlando, FL 32896-5061

Synchrony Bank/Gap
Attn: Bankruptcy Dept
PO Box 965060
Orlando, FL 32896-5060

Synchrony Bank/Walmart
Attn: Bankruptcy Dept
Po Box 965060
Orlando, FL 32896-5060

Target
Target Card Services
Mail Stop NCB-0461
Minneapolis, MN 55440

US Dept of Education
Attn: Bankruptcy
PO Box 16448
Saint Paul, MN 55116-0448

United States Attorney
Northern District of Georgia
75 Ted Turner Drive SW
Suite 600
Atlanta GA 30303-3309

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

BMW Financial Services
Attn: Bankruptcy Dept
PO Box 3608
Dublin, OH 43016

Chase Card Services
Correspondence Dept
PO Box 15298
Wilmington, DE 19850

(d)Chase Mortgage
Mail Code: OH4-7302
PO Box 24696
Columbus, OH 43224

Credit Union Loan Source
Attn: Bankruptcy
PO Box 105388
Atlanta, GA 30348

IRS
Attn: Bankruptcy
PO Box 21126
Philadelphia, PA 19114

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)HSBC Bank USA, National Association

(u)SELECT PORTFOLIO SERVICING, INC

End of Label Matrix

Mailable recipients	41
Bypassed recipients	2
Total	43